



Compliance History Report

PUBLISHED Compliance History Report for CN600128284, RN100225085, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

Customer, Respondent, or Owner/Operator:	CN600128284, E. I. du Pont de Nemours and Company	Classification: SATISFACTORY	Rating: 5.25
Regulated Entity:	RN100225085, E I DU PONT DE NEMOURS LA PORTE PLANT	Classification: SATISFACTORY	Rating: 4.18
Complexity Points:	50	Repeat Violator:	NO
CH Group:	05 - Chemical Manufacturing		
Location:	12501 STRANG RD LA PORTE, TX 77571-8704, HARRIS COUNTY		
TCEQ Region:	REGION 12 - HOUSTON		

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER HG0218K

AIR OPERATING PERMITS PERMIT 1846

AIR OPERATING PERMITS PERMIT 1906

AIR OPERATING PERMITS PERMIT 1911

AIR OPERATING PERMITS PERMIT 1891

AIR NEW SOURCE PERMITS REGISTRATION 93294

AIR NEW SOURCE PERMITS REGISTRATION 12705

AIR NEW SOURCE PERMITS PERMIT 20800

AIR NEW SOURCE PERMITS REGISTRATION 23740

AIR NEW SOURCE PERMITS REGISTRATION 25009

AIR NEW SOURCE PERMITS REGISTRATION 25400

AIR NEW SOURCE PERMITS REGISTRATION 26222

AIR NEW SOURCE PERMITS REGISTRATION 26340

AIR NEW SOURCE PERMITS REGISTRATION 24984

AIR NEW SOURCE PERMITS REGISTRATION 30182

AIR NEW SOURCE PERMITS REGISTRATION 32351

AIR NEW SOURCE PERMITS REGISTRATION 34178

AIR NEW SOURCE PERMITS REGISTRATION 36110

AIR NEW SOURCE PERMITS REGISTRATION 37427

AIR NEW SOURCE PERMITS REGISTRATION 37750

AIR NEW SOURCE PERMITS REGISTRATION 41316

AIR NEW SOURCE PERMITS REGISTRATION 41786

AIR NEW SOURCE PERMITS REGISTRATION 44807

AIR NEW SOURCE PERMITS REGISTRATION 44934

AIR NEW SOURCE PERMITS REGISTRATION 46795

AIR NEW SOURCE PERMITS REGISTRATION 47657

AIR NEW SOURCE PERMITS REGISTRATION 48336

AIR NEW SOURCE PERMITS PERMIT 1834

AIR NEW SOURCE PERMITS PERMIT 2295B

AIR NEW SOURCE PERMITS PERMIT 2751

AIR NEW SOURCE PERMITS PERMIT 6502

AIR NEW SOURCE PERMITS PERMIT 7941

AIR NEW SOURCE PERMITS REGISTRATION 51618

AIR NEW SOURCE PERMITS REGISTRATION 52051

AIR NEW SOURCE PERMITS REGISTRATION 84460

AIR NEW SOURCE PERMITS ACCOUNT NUMBER HG0218K

AIR NEW SOURCE PERMITS REGISTRATION 55472

AIR NEW SOURCE PERMITS REGISTRATION 53691

AIR NEW SOURCE PERMITS REGISTRATION 53933

AIR NEW SOURCE PERMITS REGISTRATION 55100

AIR NEW SOURCE PERMITS REGISTRATION 75781

AIR OPERATING PERMITS PERMIT 1845

AIR OPERATING PERMITS PERMIT 1905

AIR OPERATING PERMITS PERMIT 1907

AIR OPERATING PERMITS PERMIT 1990

AIR NEW SOURCE PERMITS AFS NUM 4820100011

AIR NEW SOURCE PERMITS REGISTRATION 71932

AIR NEW SOURCE PERMITS REGISTRATION 12725

AIR NEW SOURCE PERMITS PERMIT 21130

AIR NEW SOURCE PERMITS REGISTRATION 23688

AIR NEW SOURCE PERMITS REGISTRATION 25657

AIR NEW SOURCE PERMITS REGISTRATION 27385

AIR NEW SOURCE PERMITS REGISTRATION 26496

AIR NEW SOURCE PERMITS REGISTRATION 28383

AIR NEW SOURCE PERMITS REGISTRATION 26592

AIR NEW SOURCE PERMITS REGISTRATION 30428

AIR NEW SOURCE PERMITS REGISTRATION 34030

AIR NEW SOURCE PERMITS REGISTRATION 35510

AIR NEW SOURCE PERMITS REGISTRATION 36341

AIR NEW SOURCE PERMITS REGISTRATION 37277

AIR NEW SOURCE PERMITS REGISTRATION 39520

AIR NEW SOURCE PERMITS REGISTRATION 41436

AIR NEW SOURCE PERMITS REGISTRATION 44102

AIR NEW SOURCE PERMITS REGISTRATION 44835

AIR NEW SOURCE PERMITS REGISTRATION 46250

AIR NEW SOURCE PERMITS REGISTRATION 47006

AIR NEW SOURCE PERMITS REGISTRATION 48201

AIR NEW SOURCE PERMITS REGISTRATION 50145

AIR NEW SOURCE PERMITS PERMIT 2295A

AIR NEW SOURCE PERMITS PERMIT 2446A

AIR NEW SOURCE PERMITS PERMIT 3406

AIR NEW SOURCE PERMITS PERMIT 7820

AIR NEW SOURCE PERMITS PERMIT 7986

AIR NEW SOURCE PERMITS REGISTRATION 51352

AIR NEW SOURCE PERMITS REGISTRATION 93151

AIR NEW SOURCE PERMITS REGISTRATION 55092

AIR NEW SOURCE PERMITS REGISTRATION 54748

AIR NEW SOURCE PERMITS REGISTRATION 55169

AIR NEW SOURCE PERMITS REGISTRATION 53898

AIR NEW SOURCE PERMITS REGISTRATION 54142

AIR NEW SOURCE PERMITS REGISTRATION 75780

AIR NEW SOURCE PERMITS REGISTRATION 75939

AIR NEW SOURCE PERMITS REGISTRATION 55942
AIR NEW SOURCE PERMITS REGISTRATION 70090
AIR NEW SOURCE PERMITS REGISTRATION 71485
AIR NEW SOURCE PERMITS REGISTRATION 71521
AIR NEW SOURCE PERMITS REGISTRATION 71589
AIR NEW SOURCE PERMITS REGISTRATION 71079
AIR NEW SOURCE PERMITS REGISTRATION 54434
AIR NEW SOURCE PERMITS REGISTRATION 54656
AIR NEW SOURCE PERMITS REGISTRATION 73137
AIR NEW SOURCE PERMITS REGISTRATION 55864
AIR NEW SOURCE PERMITS REGISTRATION 74547
AIR NEW SOURCE PERMITS REGISTRATION 74781
AIR NEW SOURCE PERMITS REGISTRATION 77924
AIR NEW SOURCE PERMITS REGISTRATION 79091
AIR NEW SOURCE PERMITS REGISTRATION 79624
AIR NEW SOURCE PERMITS REGISTRATION 79682
AIR NEW SOURCE PERMITS REGISTRATION 79824
AIR NEW SOURCE PERMITS REGISTRATION 81161
AIR NEW SOURCE PERMITS REGISTRATION 81328
AIR NEW SOURCE PERMITS REGISTRATION 83253
AIR NEW SOURCE PERMITS REGISTRATION 82353
AIR NEW SOURCE PERMITS REGISTRATION 86302
AIR NEW SOURCE PERMITS REGISTRATION 90542
AIR NEW SOURCE PERMITS REGISTRATION 85923
AIR NEW SOURCE PERMITS REGISTRATION 88256
AIR NEW SOURCE PERMITS REGISTRATION 91667
AIR NEW SOURCE PERMITS REGISTRATION 94357
AIR NEW SOURCE PERMITS REGISTRATION 99259
AIR NEW SOURCE PERMITS REGISTRATION 111049
AIR NEW SOURCE PERMITS REGISTRATION 111054
AIR NEW SOURCE PERMITS REGISTRATION 106293
AIR NEW SOURCE PERMITS REGISTRATION 107071
AIR NEW SOURCE PERMITS REGISTRATION 123132
AIR NEW SOURCE PERMITS REGISTRATION 124137
AIR NEW SOURCE PERMITS REGISTRATION 111046
AIR NEW SOURCE PERMITS REGISTRATION 109185
AIR NEW SOURCE PERMITS REGISTRATION 118171
AIR NEW SOURCE PERMITS REGISTRATION 117546
WASTEWATER EPA ID TX0007293

PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 35066

STORMWATER PERMIT TXR05P548

AIR EMISSIONS INVENTORY ACCOUNT NUMBER
HG0218K

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30046

POLLUTION PREVENTION PLANNING ID NUMBER
P00192

AIR NEW SOURCE PERMITS REGISTRATION 75522
AIR NEW SOURCE PERMITS REGISTRATION 70680
AIR NEW SOURCE PERMITS REGISTRATION 71515
AIR NEW SOURCE PERMITS REGISTRATION 71555
AIR NEW SOURCE PERMITS REGISTRATION 71637
AIR NEW SOURCE PERMITS REGISTRATION 70683
AIR NEW SOURCE PERMITS REGISTRATION 55709
AIR NEW SOURCE PERMITS REGISTRATION 72501
AIR NEW SOURCE PERMITS REGISTRATION 55614
AIR NEW SOURCE PERMITS REGISTRATION 74445
AIR NEW SOURCE PERMITS REGISTRATION 73850
AIR NEW SOURCE PERMITS REGISTRATION 77245
AIR NEW SOURCE PERMITS REGISTRATION 77101
AIR NEW SOURCE PERMITS REGISTRATION 79153
AIR NEW SOURCE PERMITS REGISTRATION 79912
AIR NEW SOURCE PERMITS REGISTRATION 80234
AIR NEW SOURCE PERMITS REGISTRATION 81545
AIR NEW SOURCE PERMITS REGISTRATION 81466
AIR NEW SOURCE PERMITS REGISTRATION 82048
AIR NEW SOURCE PERMITS REGISTRATION 82394
AIR NEW SOURCE PERMITS REGISTRATION 83743
AIR NEW SOURCE PERMITS REGISTRATION 83045
AIR NEW SOURCE PERMITS REGISTRATION 81488
AIR NEW SOURCE PERMITS REGISTRATION 81487
AIR NEW SOURCE PERMITS REGISTRATION 92250
AIR NEW SOURCE PERMITS REGISTRATION 93752
AIR NEW SOURCE PERMITS REGISTRATION 98906
AIR NEW SOURCE PERMITS REGISTRATION 102077
AIR NEW SOURCE PERMITS REGISTRATION 104938
AIR NEW SOURCE PERMITS REGISTRATION 120431
AIR NEW SOURCE PERMITS REGISTRATION 120918
AIR NEW SOURCE PERMITS REGISTRATION 111053
AIR NEW SOURCE PERMITS REGISTRATION 111051
AIR NEW SOURCE PERMITS REGISTRATION 104917
AIR NEW SOURCE PERMITS REGISTRATION 122607
AIR NEW SOURCE PERMITS REGISTRATION 120445
AIR NEW SOURCE PERMITS REGISTRATION 104939

WASTEWATER PERMIT WQ0000474000

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION
1011171

WATER LICENSING LICENSE 1011171

IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30046

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD008079212

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50213

Compliance History Period: September 01, 2009 to August 31, 2014 **Rating Year:** 2014 **Rating Date:** 09/01/2014

Date Compliance History Report Prepared: November 15, 2014

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: September 01, 2009 to November 15, 2014

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: TCEQ Staff Member

Phone: (512) 239-1000

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1* Effective Date: 09/26/2010 ADMINORDER 2010-0313-AIR-E (1660 Order-Agreed Order With Denial)
 Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov Special Condition 1 PERMIT
 Description: Failed to prevent unauthorized emissions during Incident No. 130915. Specifically, 355 pounds ("lbs") of carbon dioxide and 3,700 lbs of methylene chloride, a hazardous air pollutant, were released from a relief valve (Emissions Point No. LN-21F) in the Lannate/API Unit during an emissions event that began on October 14, 2009 and lasted 7 hours and 6 minutes. The unauthorized release was the result of a failed pressure transmitter which caused the vent system to overpressurize,
 Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 5C THSC Chapter 382 382.085(b)
 Description: Failed to timely report Incident No. 130915 within 24 hours after discovery. Specifically, the event was discovered on October 14, 2009, at 11:00 p.m. However, the initial notification was not submitted until October 19, 2009, at 4:31 p.m.
- 2* Effective Date: 12/19/2011 ADMINORDER 2011-0757-AIR-E (Findings Order-Agreed Order Without Denial)
 Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov General Terms & Conditions OP
 Description: Failure to submit the semi-annual deviation report dated November 17, 2010 within 30 days after the end of the reporting period. (CATEGORY B3 violation)
- 3* Effective Date: 08/05/2012 ADMINORDER 2012-0093-AIR-E (1660 Order-Agreed Order With Denial)
 Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov Special Conditions 1 PERMIT
 Description: Failed to prevent unauthorized emissions during an emissions event (Incident No. 160293) which occurred on October 7, 2011, and lasted approximately two hours in the Vinyls A-Plant Unit. Specifically, 1,900 pounds of ethylene were released when the one-half inch transmitter tubing on the ethylene supply header broke. Since the emissions event could have been avoided by better operational practices, the demonstration criteria for an affirmative defense could not be met.
- 4* Effective Date: 10/27/2012 ADMINORDER 2012-0598-AIR-E (Findings Order-Agreed Order Without Denial)
 Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov Special Condition 18 PERMIT
 ST&C 5 OP
 Description: Failed to maintain the liquid flow rate to the Hydrogen Fluoride ("HF") Scrubber above 87 gallons per minute ("gpm") on April 11, 2011 for six minutes, on May 15, 2011 for 12 minutes, and on September 1, 2011 for 43 minutes.
- 5* Effective Date: 11/11/2012 ADMINORDER 2012-0050-IWD-E (1660 Order-Agreed Order With Denial)
 Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Rqmt Prov Effluent Limits PERMIT

Description: Failure to comply with permitted effluent limitations for Outfalls 101 and 201, as documented during record reviews conducted on December 9, 2011, and April 4, 2012

6* Effective Date: 08/15/2014 ADMINORDER 2013-2104-IWD-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov Effluent Limits PERMIT
Description: Failure to comply with permit effluent limits as documented by a TCEQ record review of self-reported data.

*Final Enforcement Orders, court judgments and consent decrees applicable to the Compliance History period 09/01/2009 to 08/31/2014

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1*	September 03, 2009**	(747011)
Item 2	September 22, 2009**	(767226)
Item 3*	October 15, 2009**	(924888)
Item 4*	November 09, 2009**	(777109)
Item 5*	November 10, 2009**	(778076)
Item 6*	November 18, 2009**	(805005)
Item 7*	December 03, 2009**	(783577)
Item 8	December 21, 2009**	(805006)
Item 9*	January 07, 2010**	(786284)
Item 10	January 22, 2010**	(805007)
Item 11*	February 05, 2010**	(787487)
Item 12	February 10, 2010**	(786789)
Item 13*	February 12, 2010**	(787495)
Item 14	February 26, 2010**	(805004)
Item 15*	March 12, 2010**	(794629)
Item 16*	March 15, 2010**	(793882)
Item 17*	March 16, 2010**	(793584)
Item 18*	March 17, 2010**	(794414)
Item 19*	March 19, 2010**	(831002)
Item 20*	March 22, 2010**	(793494)
Item 21	April 01, 2010**	(793813)
Item 22*	April 07, 2010**	(797870)
Item 23*	April 22, 2010**	(798404)
Item 24*	May 07, 2010**	(794423)
Item 25	May 24, 2010**	(831004)
Item 26*	May 25, 2010**	(803599)
Item 27*	May 27, 2010**	(798885)
Item 28	June 17, 2010**	(846308)
Item 29	June 30, 2010**	(790348)
Item 30*	July 14, 2010**	(828955)
Item 31	July 21, 2010**	(860898)
Item 32	July 22, 2010**	(794179)
Item 33*	July 23, 2010**	(825858)
Item 34*	August 17, 2010**	(866873)
Item 35	August 18, 2010**	(790338)
Item 36	August 27, 2010**	(794180)
Item 37*	September 02, 2010**	(843397)
Item 38*	September 22, 2010**	(873944)
Item 39	October 21, 2010**	(881541)
Item 40*	October 26, 2010**	(865837)

Item 41	November 30, 2010**	(896287)
Item 42	December 14, 2010**	(873618)
Item 43*	December 16, 2010**	(873720)
Item 44*	December 21, 2010**	(882751)
Item 45*	January 05, 2011**	(896286)
Item 46	January 24, 2011**	(909129)
Item 47	February 22, 2011**	(909128)
Item 48	March 21, 2011**	(916380)
Item 49*	March 30, 2011**	(899782)
Item 50*	April 12, 2011**	(907101)
Item 51*	April 15, 2011**	(899799)
Item 52	April 25, 2011**	(924883)
Item 53*	April 26, 2011**	(878117)
Item 54	April 29, 2011**	(899780)
Item 55	May 19, 2011**	(907779)
Item 56*	May 20, 2011**	(901539)
Item 57	May 24, 2011**	(899778)
Item 58	June 02, 2011**	(915834)
Item 59	June 16, 2011**	(899776)
Item 60	June 20, 2011**	(934127)
Item 61	June 22, 2011**	(945438)
Item 62*	July 18, 2011**	(893104)
Item 63*	July 20, 2011**	(922870)
Item 64*	July 22, 2011**	(952663)
Item 65	July 27, 2011**	(936796)
Item 66*	August 19, 2011**	(948943)
Item 67	August 31, 2011**	(950337)
Item 68	September 22, 2011**	(965381)
Item 69*	October 13, 2011**	(957690)
Item 70	October 17, 2011**	(971420)
Item 71	November 21, 2011**	(977577)
Item 72	December 19, 2011**	(974247)
Item 73	December 21, 2011**	(969260)
Item 74*	January 17, 2012**	(976436)
Item 75	January 20, 2012**	(977058)
Item 76	January 24, 2012**	(977347)
Item 77	February 21, 2012**	(998007)
Item 78*	March 01, 2012**	(988309)
Item 79*	March 22, 2012**	(1003533)
Item 80*	April 20, 2012**	(996918)
Item 81*	April 23, 2012**	(1010099)
Item 82	April 25, 2012**	(989225)
Item 83	April 26, 2012**	(989206)
Item 84*	May 08, 2012**	(1001157)
Item 85	May 10, 2012**	(983552)
Item 86*	May 17, 2012**	(1016489)
Item 87*	June 22, 2012**	(1024212)
Item 88*	July 05, 2012**	(1015498)
Item 89*	July 06, 2012**	(1015477)
Item 90	July 23, 2012**	(1031604)
Item 91	August 22, 2012**	(1061010)
Item 92*	August 23, 2012**	(1016323)
Item 93*	September 24, 2012**	(1046716)
Item 94*	October 16, 2012**	(1031121)
Item 95*	October 22, 2012**	(1061011)
Item 96*	November 20, 2012**	(1061012)
Item 97*	November 30, 2012**	(1042397)
Item 98*	December 05, 2012**	(1050240)
Item 99*	December 12, 2012**	(1051180)
Item 100*	December 27, 2012**	(1061013)

Item 101*	January 22, 2013**	(1079048)
Item 102	February 14, 2013**	(1050410)
Item 103*	February 21, 2013**	(1050729)
Item 104*	February 22, 2013**	(1059018)
Item 105	March 04, 2013**	(1055973)
Item 106*	March 22, 2013**	(1089348)
Item 107	March 26, 2013**	(1060445)
Item 108	April 22, 2013**	(1095741)
Item 109	May 06, 2013**	(1073937)
Item 110*	May 22, 2013**	(1106666)
Item 111	June 24, 2013**	(1095481)
Item 112	June 27, 2013**	(1073489)
Item 113	July 23, 2013**	(1117226)
Item 114*	August 21, 2013**	(1114247)
Item 115*	August 22, 2013**	(1093917)
Item 116*	August 23, 2013**	(1124981)
Item 117	August 30, 2013**	(1073461)
Item 118*	September 24, 2013**	(1129580)
Item 119*	October 03, 2013**	(1121243)
Item 120	October 07, 2013**	(1120448)
Item 121	October 25, 2013**	(1120140)
Item 122	November 13, 2013**	(1121627)
Item 123	November 26, 2013**	(1128522)
Item 124	December 18, 2013**	(1135095)
Item 125*	December 20, 2013**	(1147169)
Item 126*	January 22, 2014**	(1153238)
Item 127*	January 27, 2014**	(1134582)
Item 128	February 21, 2014**	(1036066)
Item 129	February 24, 2014**	(1160573)
Item 130*	March 20, 2014**	(1167218)
Item 131*	March 31, 2014**	(1151327)
Item 132*	April 04, 2014**	(1152536)
Item 133*	April 23, 2014**	(1174351)
Item 134	April 29, 2014**	(1163659)
Item 135	May 02, 2014**	(1152424)
Item 136*	May 27, 2014**	(1180539)
Item 137	June 04, 2014**	(1134860)
Item 138	June 13, 2014**	(1152619)
Item 139*	June 23, 2014**	(1187437)
Item 140	July 14, 2014**	(1157693)
Item 141*	July 21, 2014**	(1198623)
Item 142*	August 15, 2014**	(1190681)
Item 143	August 25, 2014**	(1156563)
Item 144*	August 26, 2014**	(1198624)
Item 145	September 05, 2014	(1192702)
Item 146*	September 24, 2014	(1205842)

* No violations documented during this investigation

**Investigation occurred between 09/01/2009 and 08/31/2014.

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date: 11/30/2009 (805006)	CN600128284
	Self Report? YES	Classification: Moderate
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)	
	Description: Failure to meet the limit for one or more permit parameter	
2	Date: 12/31/2009 (805007)	CN600128284
	Self Report? YES	Classification: Moderate

Published Compliance History Report for CN600128284, RN100225085, Rating Year 2014 which includes Compliance History (CH) components from September 01, 2009, through November 15, 2014.

	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)	
	Description:	Failure to meet the limit for one or more permit parameter	
3	Date:	01/31/2010 (805004)	CN600128284
	Self Report?	YES	Classification: Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)	
	Description:	Failure to meet the limit for one or more permit parameter	
4	Date:	04/01/2010 (793813)	CN600128284
	Self Report?	NO	Classification: Moderate
	Citation:	30 TAC Chapter 335, SubChapter C 335.69(a)(3) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(3)	
	Description:	During the investigation, it was noted that the TC Overheads tank, NOR unit 089, did not posses a hazardous waste label.	
	Self Report?	NO	Classification: Moderate
	Citation:	30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B) 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)	
	Description:	During the investigation, it was noted that the facility operating record was missing a daily tank inspection for April 7, 2007.	
5	Date:	04/30/2010 (831004)	CN600128284
	Self Report?	YES	Classification: Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)	
	Description:	Failure to meet the limit for one or more permit parameter	
6	Date:	05/31/2010 (846308)	CN600128284
	Self Report?	YES	Classification: Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)	
	Description:	Failure to meet the limit for one or more permit parameter	
7	Date:	06/30/2010 (860898)	CN600128284
	Self Report?	YES	Classification: Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)	
	Description:	Failure to meet the limit for one or more permit parameter	
8	Date:	07/01/2010 (790348)	CN600128284
	Self Report?	NO	Classification: Minor
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(C) FOP O-01907 General Terms and Conditions OP	
	Description:	Failure to submit Deviation Report dated June 12, 2009 within the required time frame. (CATEGORY B3 Violation)	
	Self Report?	NO	Classification: Minor
	Citation:	30 TAC Chapter 115, SubChapter B 115.142(3)(B) 30 TAC Chapter 122, SubChapter B 122.143(4)	
	Description:	Failure to maintain Total Suspended Solid levels above permitted limits. (CATEGORY C4 Violation)	
9	Date:	07/27/2010 (794179)	CN600128284
	Self Report?	NO	Classification: Minor
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition (4)(E)(3) PERMIT Special Condition 6 OP	
	Description:	Failure to install natural gas and vent flow monitors by the installation deadline of December 1, 2009, on the VP-01BC flare (Category B16 Violation).	
10	Date:	08/15/2010 (794180)	CN600128284
	Self Report?	NO	Classification: Minor
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1366(b)(1) 5C THSC Chapter 382 382.085(b)	

11

Description: Special Condition 1D OP
 Failure to maintain caustic concentration by minimum established concentration of 3% on scrubber units LN-06C and LN-07C on 3 different occasions from December 21, 2008 to September 6, 2009 (Category C4 Violation).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(e)(7)(ii)
 5C THSC Chapter 382 382.085(b)
 Special Condition 1A OP
 Description: Failure to make first attempt to repair leaking valve numbers 0058, 0157, and LAN1346 in Unit LN-21F (Category B14 Violation).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms and Conditions OP
 Description: Failure to include 4 deviations in previous semiannual deviation report from July 11, 2009 to January 8, 2010 (Category B3 Violation).
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter B 115.126(1)(A)(i)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1366(b)(1)(vii)
 5C THSC Chapter 382 382.085(b)
 Special Condition 1A OP
 Description: Failure to record temperature and flow data from December 5, 2009 to December 7, 2009 (Category B3 Violation).
 Date: 08/19/2010 (790338) CN600128284
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP #O-01911, ST&C 11 OP
 FOP #O-01911, ST&C 1A. OP
 NSR #4445, SC 5A. PA
 Description: Failure to maintain a minimum net heating value of 300 Btu/scf for the Plant "A" (Vinyls) flare (EPN VS-202C).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.617
 30 TAC Chapter 122, SubChapter B 122.143(3)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(e)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.985(a)
 5C THSC Chapter 382 382.085(b)
 FOP #O-01911, ST&C 11 OP
 FOP #O-01911, ST&C 13 OP
 FOP #O-01911, ST&C 1D. OP
 NSR #4445, SC 6. PA
 Description: Failure to maintain adequate water flow rate to process and wastewater scrubbers.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP #O-01911, ST&C 11 OP
 NSR #4445, SC 5G. PA
 Description: Failure to maintain required hourly average records for the "A" Plant (Vinyls) flare (EPN VS-202C).
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Part 60, Subpart A 60.18(c)(4)(i)
 40 CFR Part 63, Subpart A 63.11(b)(7)(i)
 5C THSC Chapter 382 382.085(b)
 FOP O-01911 ST&C 11 OP
 FOP O-01911, ST&C 1A OP
 NSR 4445 SC 5A PERMIT
 Description: Failure to maintain flare tip exit velocities below 60 feet per second.

12

Date: 08/19/2010 (794042) CN600128284
 Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O-01845 Special Term and Condition 5 OP
NSR Permit 21130 Special Condition 4 PERMIT

Description: Failure to maintain the 1500 ppmv hydrogen sulfide limit on the sulfur unloading pit (SA-04). Category B19 (g) (1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
FOP O-01845 General Terms and Conditions OP

Description: Failure to report all deviations in the second semi-annual deviation report. Category C3

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.6(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP O-01845 Special Term and Condition 6 OP

Description: Failure to maintain the representation stated in the registration for Permit by Rule 106.512. Category B19(g)(1)

- 13 Date: 09/30/2010 (881541) CN600128284
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 14 Date: 11/30/2010 (896287) CN600128284
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 15 Date: 12/14/2010 (873716) CN600128284
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(18)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT BB 264.1050(d)
Description: Failure to tag a piece of equipment subject to 40 CFR 264 Subpart BB
- 16 Date: 12/14/2010 (873618) CN600128284
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT D 264.52(d)
Description: Failure to include Emergency Coordinator information in the Contingency Plan.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(8)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT I 264.174
Description: Failure to conduct weekly hazardous waste container area inspection for the week of September 28, 2010.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(9)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT J 264.195(b)
Description: Failure to conduct daily hazardous waste tank inspections.
- 17 Date: 12/16/2010 (873729) CN600128284
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 331, SubChapter D 331.63(h)
PP V.D PERMIT
Description: Failure to maintain the specific gravity above the permit limit
- 18 Date: 12/31/2010 (909129) CN600128284
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
- 19 Date: 04/27/2011 (899777) CN600128284
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC No.,18 PERMIT
Special Terms & Condition # 10 OP
Special Terms & Conditions #5 OP
Description: Failure to meet the liquid flow rate of 87 gpm for the HFS.
Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter T 106.454(1)(E)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions #6 OP
Description: Failed to have the instructions posted on the outside of the degreaser. (Category C3)

20 Date: 04/29/2011 (899780) CN600128284
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(2)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Description: Failure to submit the PCC report dated November 17, 2010 within 30 days after the end of the compliance period. (CATEGORY B3 violation)

21 Date: 05/19/2011 (907779) CN600128284
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Description: Failure to include all deviations in the deviation reports. (Category B3)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC#6 PERMIT
STC#10 OP
Description: Failure to maintain the water flow for the scrubbers: VS-206, VS-212 and VS-376. (Category B3)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC#5A PERMIT
STC#10 OP
Description: Failure to maintain the net heating value for the flares: VS-202C, on 05/01/10; and VS-203C, on 06/23/10. (Category B3)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(b)
5C THSC Chapter 382 382.085(b)
SC# 2A PERMIT
STC# 1A OP
STC#10 OP
Description: Failure to record the flow data for the scrubbers (VS-204, VS-206, VS-212, VS-376, VS-382) from 01/01/10 through 07/20/10. (Category C3)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)(1)
5C THSC Chapter 382 382.085(b)
STC#1A OP
Description: Failure to submit the HON Subpart A, F, G and H periodic reports within 60 days of the end of the 180 day reporting period for the semi-annual reporting period. (Category C3)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC#5(D) PERMIT

Description: STC#10 OP
Failure to record the flare's, VS-202C, data on 12/06/09 and 04/22/10.
(Category C3)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.146(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.985(c)(2)
5C THSC Chapter 382 382.085(b)
SC#2 PERMIT
STC# 10 OP
STC#1A OP

Description: Failure to maintain the water flow for the scrubbers: VS-204, VS-206, VS-212
and VS-382. (Category C4)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC#9 OP

Description: Failure to monitor the specific gravity for the scrubber, VS-206, on 01/15/10,
02/19/10 and 03/19/10; and the scrubber, VS-0212. (Category B1)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.122(g)(1)(ii)
5C THSC Chapter 382 382.085(b)
STC# 1A OP

Description: Failure to report a maintenance activity on the HON Periodic Report. The
scrubber, VS-206, was taken out of service on 08/19/10, for maintenance to the
flowmeter calibration. (Category B3)

22 Date: 05/24/2011 (899778) CN600128284

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(e)(7)(ii)
5C THSC Chapter 382 382.085(b)
Special Condition 11(H) PERMIT
Special Term and Condition 6 & 4 OP

Description: Failure to conduct first attempt repair within 5 days after leak detection.
(Category B1 Violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.216(3)(A)(ii)
30 TAC Chapter 115, SubChapter C 115.216(3)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition 10(B) PERMIT
Special Term and Condition 1A and 6 OP

Description: Failure to maintain throughput records. (Category B3 Violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 4(E)(2) PERMIT
Special Term and Condition 6 OP

Description: Failure to record vent gas flow to the NaOMe flare (EPN VP-01B). (Category C1
VIolation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 4(E)(1) PERMIT
Special Term and Condition 6 OP

Description: Failure to maintain the ratio of natural gas to purge gas to the NaOMe flare (EPN
VP-01B). (Category C1 Violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 5(C) PERMIT
Special Term and Condition 6 OP

Description: Failure to record the differential pressure across the dust collector (EPN VP-10).
(Category C1 Violation)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 5(C) PERMIT
 Special Term and Condition 6 OP
 Description: Failure to maintain the differential pressure above 0"H2O across the dust collector (EPN VP-10). (Category C1 Violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 11(F) PERMIT
 Special Term and Condition 6 OP
 Description: Failure to conduct weekly inspections of pressure sensing devices. (Category B3 Violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms and Conditions OP
 Description: Failure to report all instances of a deviation. (Category C3 Violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 4(E)(1) PERMIT
 Special Term and Condition 6 OP
 Description: Failure to maintain the vent gas flow meter for the NaOMe flare (EPN VP-01B). (Category B1 Violation)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 4(E)(1) PERMIT
 Special Term and Condition 6 OP
 Description: Failure to maintain 200 BTU/scf for the NaOMe flare (EPN VP-01B). (Category C1 Violation)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 4 (D)(1) PERMIT
 Special Term and Condition 6 OP
 Description: Failure to maintain 200 BTU/scf for the for the Velpar flare (VP-01A). (Category B3 Violation)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 4(E)(2) PERMIT
 Special Term and Condition 6 OP
 Description: Failure to record vent gas flow, ratio of nitrogen gas to vent gas, and net heating value for the Velpar flare (VP-01A). (Category B3 Violation)

23 Date: 05/31/2011 (945438) CN600128284
 Self Report? YES Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Description: Failure to meet the limit for one or more permit parameter

24 Date: 06/16/2011 (899776) CN600128284
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 4 PERMIT
 Special Terms & Conditions 6 OP
 Description: Failure to maintain a concentration of less than 1,500 parts per million by volume (ppmv) hydrogen sulfide (H2S) in the sulfur transfer pit (EPN SA-05) during the dates of August 22, 2010 through August 28, 2010. [Category C]

25 Date: 08/31/2011 (965381) CN600128284

	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
26	Date:	09/30/2011 (971420)	CN600128284	
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
27	Date:	12/31/2011 (990643)	CN600128284	
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
28	Date:	01/20/2012 (977058)	CN600128284	
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THSC Chapter 382 382.085(b) General Terms & Conditions OP		
	Description:	Failure to report all deviations in the deviation report dated May 26, 2011. (Category B3 Violation)		
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition 9F PERMIT Special Term & Condition 7 OP		
	Description:	Failure to limit analyzer downtime to five percent (%) for the sulfur dioxide (SO2) analyzer for the Sulfuric Acid Absorber Stack (EPN: SA-01). (Category C1 Violation)		
29	Date:	01/24/2012 (977347)	CN600128284	
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 117, SubChapter B 117.335(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) ST&C 1A OP		
	Description:	Failure to conduct required stack testing on Process Heater HF-01H. (Category B1 Violation)		
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THSC Chapter 382 382.085(b) General Terms & Conditions OP		
	Description:	Failure to report all instances of deviations in semi-annual deviation report. (Category C3 Violation)		
30	Date:	01/31/2012 (998007)	CN600128284	
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
31	Date:	04/24/2012 (989225)	CN600128284	
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 117, SubChapter B 117.335(a)(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Terms and Conditions (ST&C) #1A OP		
	Description:	Failure to test the Dowtherm Process Heater (EPN: LN-01H). (Category B1)		
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(B) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP		
	Description:	Failure to report a deviation. (Category B3)		

32	Date: 04/26/2012 (989206)	CN600128284	
	Self Report? NO	Classification: Moderate	
	Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Terms and Conditions (ST&C) 12 OP		
	Description: Failure to sample the weekly specific gravity from the Tar Receiver Scrubber. (Category C1)		
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 115, SubChapter D 115.354(4) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Terms and Conditions (ST&C) 1 A OP		
	Description: Failure to monitor a relief valve within 24 hours of the release. (Category C1)		
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC# 5A PERMIT ST&C 13 OP		
	Description: Failure to maintain the monitoring data for A Plant Flare and B Plant Flare. (Category C1)		
	Self Report? NO	Classification: Moderate	
	Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP		
	Description: Failure to report a deviation in the DR. (Category B3)		
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart G 63.120(d)(5) 5C THSC Chapter 382 382.085(b) SC# 6 PERMIT ST&C 13 OP ST&C 1A OP		
	Description: Failure to maintain the monitoring data for the scrubbers. (Category C1)		
33	Date: 05/11/2012 (983552)	CN600128284	
	Self Report? NO	Classification: Minor	
	Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(C) 5C THSC Chapter 382 382.085(b) FOP O-1907 General Terms & Conditions OP		
	Description: Failure to submit an amended PCC report within the specified timeframe. (Category C3)		
34	Date: 06/30/2012 (1031604)	CN600128284	
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
35	Date: 07/31/2012 (1061010)	CN600128284	
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
36	Date: 02/15/2013 (1050410)	CN600128284	
	Self Report? NO	Classification: Moderate	
	Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT H 60.84(a) 5C THSC Chapter 382 382.085(b) Special Condition 9C PERMIT ST&C 1(A) OP ST&C 7 OP		
	Description: Failure to record monitoring data in the PSA stack (SA-01) and the converter. Subcategory C1.		

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1(A) OP
ST&C 6 OP
Description: Failure to include the degreaser's monthly visual inspection record for the deviation period noted. Subcategory C1.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 8 PERMIT
ST&C 7 OP
Description: Failure to take semi-annual H2S sample in a timely manner. Subcategory C1.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
ST&C 1(A) OP
Description: Failure to report the degreaser's monthly visual inspection deviation on deviation report dated May 22, 2012. Subcategory: C3

37 Date: 03/26/2013 (1060445) CN600128284
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.781(b)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP
Description: Failure to monitor 4250 plugs in HRVOC service. (CATEGORY B1 VIOLATION)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.120(d)(5)
5C THSC Chapter 382 382.085(b)
Special Condition 6 PERMIT
Special Term & Condition 13 OP
Special Term & Condition 1A OP
Description: Failure to operate multiple Scrubbers with a water flow at or above the minimum flow. (CATEGORY C4 VIOLATION)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter H 115.782(b)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP
Description:) Late Re-Monitoring of one Connector. (CATEGORY C1 VIOLATION)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP
Special Term & Condition 12 OP
Description: Failure to perform weekly specific gravity sampling to the Super Scrubber. (CATEGORY C1 VIOLATION)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP
Description: Failure to make a first repair attempt within five days. (CATEGORY C4 VIOLATION)

38 Date: 03/31/2013 (1095741) CN600128284
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

39 Date: 05/07/2013 (1073937) CN600128284
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(c)(3)

5C THSC Chapter 382 382.085(b)
 SC 18 PERMIT
 ST&C 1A OP
 ST&C 6 OP
 Description: Failure to record the liquid flow rate to the Hydrogen Fluoride Scrubber (EPN HF-01). (Category C3 Violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP
 ST&C 5 OP

Description: Failure to conduct monthly visual inspections of the degreaser (EPN HFDEGR). (Category C1 Violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms and Conditions OP

Description: Failure to report all instances of deviations. (Category B3 Violation)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(c)(3)
 5C THSC Chapter 382 382.085(b)
 SC 18 PERMIT
 ST&C 1A OP
 ST&C 6 OP

Description: Failure to maintain the Hydrogen Fluoride Scrubber's (EPN HF-01) liquid flow rate in the amount not less than 87 gallons per minute (gpm). (Category C4 Violation)

40 Date: 05/31/2013 (1110341) CN600128284

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

41 Date: 06/28/2013 (1073489) CN600128284

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)
 5C THSC Chapter 382 382.085(b)

Description: Failure to maintain stationary vent opacity below a 20% average over a six-minute period. [C4]

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)

FOP General Terms & Conditions OP
 Description: Failure to report all deviations. [B3]

42 Date: 06/30/2013 (1117226) CN600128284

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

43 Date: 08/30/2013 (1073461) CN600128284

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term and Condition 7 OP
 NSR Special Condition 7B PERMIT

Description: Failure to operate the Lannate incinerator (EPN LN-01) within required parameters [Category B18 violation]

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(d)(1)(i)
 5C THSC Chapter 382 382.085(b)
 FOP Special Terms and Conditions 1A, 5 OP

Description: Failure to plug or cap an open-ended line [Category C10 violation]

Self Report? NO Classification: Moderate

	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP Special Term and Condition 7 OP NSR Special Condition 8B PERMIT		
	Description:	Failure to operate the NRS vapor incinerator (EPN LN-50) within required parameters [Category B18 violation]		
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP Special Term and Condition 7 OP NSR Special Condition 20(C)(2) PERMIT		
	Description:	Failure to perform a functionality check on an LEL meter prior to use [Category C1 violation]		
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(c)(3)(ii) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363(e)(7)(ii) 5C THSC Chapter 382 382.085(b) FOP Special Terms & Conditions 1A, 5, 7 OP NSR Special Conditions 3 and 11H PERMIT		
	Description:	Failure to conduct a first attempt at repair within five days on leaking components [Category C4 violation]		
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) FOP Special Term and Condition 6 OP		
	Description:	Failure to conduct a monthly inspection of the degreaser [Category C1 violation]		
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THSC Chapter 382 382.085(b) FOP General Terms and Conditions OP		
	Description:	Failure to report all deviations [Category C3 violation]		
44*	Date:	10/25/2013 (1120140)	CN600128284	
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) Special Condition 1 PERMIT		
	Description:	Failure to prevent unauthorized emissions due to an open block valves.		
45*	Date:	11/26/2013 (1128522)	CN600128284	
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 331, SubChapter D 331.64(d) WDW-149 Permit Provision XI.E.2. PERMIT		
	Description:	During third quarter calibration at WDW-149, the well was reportedly shut in as indicated by a zero value in the control room; however, the flow data obtained from the same period indicated there was flow to the well.		
	Self Report?	NO	Classification:	Moderate
	Citation:	30 TAC Chapter 331, SubChapter D 331.65(c)(1) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.69(a)(1) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.69(a)(2) 40 CFR Chapter 146, SubChapter D, PT 146, SubPT G 146.69(a)(3)		
	Description:	DuPont failed to report the correct maximum surface injection pressure at WDW-149 for September 2012.		
46*	Date:	01/31/2014 (1160573)	CN600128284	
	Self Report?	YES	Classification:	Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description:	Failure to meet the limit for one or more permit parameter		
47*	Date:	05/02/2014 (1152424)	CN600128284	
	Self Report?	NO	Classification:	Minor
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) Special Condition 18 PERMIT		

Description: Special Term and Condition 6 OP
Failure to maintain the minimum liquid flow rate of scrubber (EPN: HF-01P).
(Category C4)

48* Date: 05/02/2014 (1152616) CN600128284
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(3)
5C THSC Chapter 382 382.085(b)
Special Condition 4B PERMIT
Special Term & Condition 6 OP
Description: The Velpar Flare and NAOME Flare both lost pilots due to a power outage for 10 minutes on 03/16/2013. The NAOME Flare lost pilot due to solenoid valve failure for 40 minutes on 08/23/2013. (Category B18)

49* Date: 06/05/2014 (1134860) CN600128284
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.110(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
ST&C 1 OP
Description: Failure to prevent an open ended line in HAP service from the Environmental Control Area. (Category C-10)

50* Date: 06/13/2014 (1152619) CN600128284
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 6 PERMIT
Special Term and Condition 17 OP
Description: Failure to maintain the flow rate of liquid to an absorber (EPN VS-206) above 17 gallons per minute [Category C4 violation]
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 115, SubChapter H 115.783(5)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 7E PERMIT
Special Terms & Conditions 1A and 17 OP
Description: Failure to properly plug or cap an open-ended line [Category C10 violation]
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 12D(2) PERMIT
Special Term and Condition 17 OP
Description: Failure to sample VOC concentration during maintenance events [Category C1 violation]
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 13B(3) PERMIT
Special Term and Condition 17 OP
Description: Failure to sample at required intervals prior to opening equipment for maintenance activities [Category C1 violation]
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 12 PERMIT
Special Term and Condition 17 OP
Description: Failure to properly purge or wash equipment prior to equipment opening for maintenance [Category B18 violation]

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 7B PERMIT
 Special Term & Condition 7 OP

Description: Failure to maintain six minute average oxygen concentration of Methomyl Incinerator (EPN Unit LN-02C) (Category B13)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1366(b)(1)
 5C THSC Chapter 382 382.085(b)
 Special Term and Conditions1(A) OP

Description: Failure to maintain flow rate for API Scrubber (EPN: SF-01C) and API Venturi Scrubber (EPN: SF-02C) (Category C4)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter B 115.144(5)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.136(e)(1)(i)
 5C THSC Chapter 382 382.085(b)
 Special Term & Condition 1A OP

Description: Failure to meet monitoring requirements of permit. Weekly inspection records for TC Waste Tank (EPN: EC30-T) and Rainwater Tank (EC-31T) seals were not maintained. (Category C1)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 General Terms and Conditions OP

Description: Failure include all deviations in the reporting period for which the deviation occurred, the probable cause of the deviation and any corrective action or preventative measures taken for emission units addressed in the permit. Water seal weekly inspection records failed to appear on the previous deviation report in the period in which checks should have occurred for water seals on TC Waste Tank and Rainwater Tank (EPNs: Unit EC-30-T;EC-31T). (Category C1)

Self Report? YES

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 8B PERMIT
 Special Term & Condition 7 OP

Description: Failure to maintain minimum 6 minute average of 1600° Fahrenheit limit established during the performance test for NRS Vapor Incinerator (EPN: LN-50 C)(Category C4)

* NOV's applicable for the Compliance History rating period 9/1/2009 to 8/31/2014

F. Environmental audits:

Notice of Intent Date: 10/04/2010 (877022)

Disclosure Date: 01/07/2011

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT Special Conditions 11.J and 12.K

Description: Failure to record all actual readings of LDAR components whether a leak is detected or not. Specifically, fourth quarter monitoring in Lannate/API was conducted and background instrument readings were recorded for 3,745 components in which no leaks were detected were being recorded, rather than using the actual reading.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT Special Condition 11.E

Description: Failure to updated the delay of repair (DOR) emission calculation spreadsheet within 10 days of adding new DOR components to the list due to personnel changes.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT Special Condition 11.E

Description: One open-ended valve was found in the Lannate/API Unit.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1367(c)

Description: Failure to properly maintain records. Specifically, weekly AVO inspection records for pumps and connectors were not available for a period of five years. Records were available for the most recent 18 months, but not prior due to shorter record retention period specified by corporate guidelines.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363

Description: Failure to include approximately 50 components that should have been included in the LDAR program for monitoring within the TCO Tank in the Environmental Control area.

Disclosure Date: 04/14/2011

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT Special Conditions 11.J and 12.K

Description: Failure to record all actual readings of LDAR components whether a leak is detected or not. Specifically, fourth quarter monitoring in Lannate/API was conducted and background instrument readings were recorded for 3,745 components in which no leaks were detected were being recorded, rather than using the actual reading.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT Special Condition 11.E

Description: Failure to update the delay of repair (DOR) emission calculation spreadsheet within 10 days of adding new DOR components to the list due to personnel changes.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115

Rqmt Prov: PERMIT Special Condition 11.E

Description: One open-ended valve was found in the Lannate/API Unit.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1367(c)

Description: Failure to properly maintain records. Specifically, weekly AVO inspection records for pumps and connectors were not available for a period of five years. Records were available for the most recent 18 months, but not prior due to shorter record retention period specified by corporate guidelines.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT MMM 63.1363

Description: Failure to include approximately 50 components that should have been included in the LDAR program for monitoring within the TCO Tank in the Environmental Control area.

*NOA/DOVs applicable for the Compliance History rating period 09/01/2009 to 8/31/2014

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A